

FILED

JUL 10 2013

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

KEITH CONWAY,

Defendant.

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) NO.  
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**4:13CR00291CDP**

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INDICTMENT

**THE GRAND JURY CHARGES:**

INTRODUCTION

At all times relevant to the Indictment, and as to Counts 1 through 4:

1. The defendant, **KEITH CONWAY**, is the former elected Mayor of the City of Kinloch, Missouri. On or about November 18, 2011, **KEITH CONWAY** was convicted in the United States District Court for the Eastern District of Missouri, Case Number S1-4:11CR193RWS, of Wire Fraud, Theft From a Government Program, and Witness Tampering relative to his service as Mayor of Kinloch. Upon those convictions, defendant **KEITH CONWAY** was sentenced to serve a term of 21 months' imprisonment in the United States Bureau of Prisons.

2. On or about May 1, 2013, the United States Bureau of Prisons transferred defendant **KEITH CONWAY** from its prison facility at USP Marion to its Community Corrections Management in St. Louis, Missouri where defendant was assigned housing at the Dismas House residential reentry center located in St. Louis, Missouri. The United States Bureau of Prisons contracts with Dismas House for the housing and supervision of Bureau of Prisons inmates, and

retains jurisdiction and responsibility over those inmates, including defendant **KEITH CONWAY**, until their ultimate release from Bureau of Prisons' custody upon completion of their sentence.

3. As a resident of Dismas House, the United States Bureau of Prisons required defendant **KEITH CONWAY** to seek and obtain full-time employment, and to submit paycheck stubs to verify that employment to the Dismas House Program Director. While a resident at Dismas House, defendant falsely represented that he had obtained full-time employment and, as a result, defendant was permitted to leave the Dismas House premises during his purported work hours.

### **COUNT 1**

#### **SUBMISSION OF FALSE DOCUMENT**

4. On or about May 28, 2013, in the Eastern District of Missouri, defendant, **KEITH CONWAY**, did willfully and knowingly use and cause to be used, in a matter within the jurisdiction of a department or agency of the United States, a false writing or document, knowing the same to contain a materially false, fictitious, and fraudulent statement. Defendant **KEITH CONWAY** submitted a false and fraudulent paycheck stub to the Dismas House Federal Program Director falsely representing both that he had worked 19 hours during the period May 11, 2013 through May 17, 2013, and that he had earned gross pay of \$139.65 during that period, well knowing and believing that the hours worked and gross pay stated on the paycheck stub were false.

All in violation of Title 18, United States Code, Section 1001.

### **COUNT 2**

#### **SUBMISSION OF FALSE DOCUMENT**

5. On or about June 3, 2013, in the Eastern District of Missouri, defendant,

**KEITH CONWAY,**

did willfully and knowingly use and cause to be used, in a matter within the jurisdiction of a department or agency of the United States, a false writing or document, knowing the same to contain a materially false, fictitious, and fraudulent statement. Defendant **KEITH CONWAY** submitted a false and fraudulent paycheck stub to the Dismas House Federal Program Director falsely representing both that he had worked 40 hours during the period May 18, 2013 through May 24, 2013 and that he had earned gross pay of \$294.00 during that period, well knowing and believing that the hours worked and gross pay stated on the paycheck stub were false.

All in violation of Title 18, United States Code, Section 1001.

**COUNT 3**

**SUBMISSION OF FALSE DOCUMENT**

6. On or about June 10, 2013, in the Eastern District of Missouri, defendant,

**KEITH CONWAY,**

did willfully and knowingly use and cause to be used, in a matter within the jurisdiction of a department or agency of the United States, a false writing or document, knowing the same to contain a materially false, fictitious, and fraudulent statement. Defendant **KEITH CONWAY** submitted a false and fraudulent paycheck stub to the Dismas House Federal Program Director falsely representing both that he had worked 40 hours during the period May 25, 2013 through May 31, 2013 and that he had earned gross pay of \$294.00 during that period, well knowing and believing that the hours worked and gross pay stated on the paycheck stub were false.

All in violation of Title 18, United States Code, Section 1001.

**COUNT 4**

**SUBMISSION OF FALSE DOCUMENT**

7. On or about June 20, 2013, in the Eastern District of Missouri, defendant,

**KEITH CONWAY,**

did willfully and knowingly use and cause to be used, in a matter within the jurisdiction of a department or agency of the United States, a false writing or document, knowing the same to contain a materially false, fictitious, and fraudulent statement. Defendant **KEITH CONWAY** submitted a false and fraudulent paycheck stub to the Dismas House Federal Program Director falsely representing both that he had worked 40 hours during the period June 8, 2013 through June 14, 2013, and that he had earned gross pay of \$294.00 during that period, well knowing and believing that the hours worked and gross pay stated on the paycheck stub were false.

All in violation of Title 18, United States Code, Section 1001.

A TRUE BILL.

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FOREPERSON

RICHARD G. CALLAHAN  
United States Attorney

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Assistant United States Attorney